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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

TODD C. ENGEL,

Defendant.

2:16-CR-00046-GMN-PAL

**FIRST STIPULATION TO
CONTINUE DEADLINE FOR
GOVERNMENT'S RESPONSE TO
DEFENDANT'S MOTION FOR
RELEASE PENDING SENTENCING
AND/OR APPEAL (ECF No. 3180)**

IT IS HEREBY STIPULATED AND AGREED, by and between the United States, by and through the undersigned, and Warren R. Markowitz, counsel for defendant TODD C. ENGEL, that the government's deadline to file its Response to Defendant's Motion for Release Pending Sentencing and/or Appeal (ECF No. 3180) currently set for February 22, 2018, be continued for a period of four (4) days to on or before February 26, 2018.

This stipulation is entered for the following reasons:

1. The parties agree to the continuance.

2. The Government wishes to consolidate its response to the instant Motion, ECF No. 3180, with its response to Defendant's Motion for a New Trial or Judgment of Acquittal, ECF No. 3183, both motions raising identical and/or common issues.

3. The government's response to ECF 3183 is not due to be filed until on or before February 26, 2018.

4. The Defendant is in custody following a jury verdict and while pending a sentencing hearing, and does not object to a brief continuance.

5. This request is not made for the purposes of delay but in order to accommodate a consolidated response to pending motions and thereby conserve judicial and government resources and, at the same time, ensure that all issues raised in the pending motions are fully briefed to the Court.

6. This is the first request for a continuance filed herein.

WHEREFORE, the parties respectfully request that the Court accept the Stipulation and enter an Order as set forth below, continuing the government's response deadline to the Motion for Release Pending Sentencing and/or Appeal by a period of four (4) days to February 26, 2018.

DATED this 21st day of February, 2018.

Respectfully submitted,

/s/ Steven W. Myhre

STEVEN W. MYHRE
Assistant United States Attorney
Counsel for the United States

/s/ Warren R. Markowitz

WARREN R. MARKOWITZ
Counsel for Defendant

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 TODD C. ENGEL,

7 Defendant.

2:16-CR-00046-GMN-PAL

ORDER ON STIPULATION

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9 This matter coming before the Court on Stipulation to Extend Time for the
10 Government to Respond to Defendant's Motion for Release Pending Sentencing
11 and/or Appeal (ECF No. 3180), the Court having considered the matter, and good
12 cause showing the Court accepts the Stipulation.

13 **WHEREFORE, IT IS HEREBY ORDERED** that the deadline for filing the
14 Government's Response to Defendant's Motion for Release Pending Sentencing
15 and/or Appeal (ECF No. 3180), currently set for February 22, 2018, shall be, and is,
16 continued to on or before February 26, 2018.

17
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19 _____
20 GLORIA M. NAVARRO
 United States Chief District Judge

21 IT IS SO ORDERED.

22 Entered: February 21, 2018
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